



Pillsbury Winthrop Shaw Pittman LLP  
725 South Figueroa Street, Suite 3600 | Los Angeles, CA 90017-5524 | tel 213.488.7100 | fax 213.629.1033

Ronald L. Cheng  
tel: +1.213.488.3631  
ronald.cheng@pillsburylaw.com

April 29, 2024

**VIA ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2103  
New York, NY 10007

Re: *Huzhou Chuangtai Rongyuan Inv. Mgmt. Partnership et al. v. Qin et al.*,  
Index No. 1:24-cv-02219-KPF (S.D.N.Y.)

Dear Judge Failla:

We write on behalf of Plaintiffs in the above-referenced matter to provide the Court with citations to the cases described herein. At the hearing on plaintiffs' motion for preliminary injunction conducted on April 26, 2024, the undersigned referred to the following authority and stated that citations would be provided after the hearing. Those citations, along with copies of the decisions, are as follows below:

*Bascuñán v. Elsaca*, 874 F.3d 806, 824-25 (2d Cir. 2017) (domestic injury for RICO purposes; cited at Reporter's Transcript (RT) 58:24-25) (Exhibit A); and

*United States ex rel. Rahman v. Oncology Assocs., P.C.*, 198 F.3d 489, 497-98 (4th Cir. 2001) (fraudulent transfer claims are equitable for purposes of awarding injunctive relief; cited at RT 59:19) (Exhibit B).

Respectfully submitted,

/s/ Ronald L. Cheng  
Ronald L. Cheng

cc: All counsel of record (via ECF)